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Turn to the Experts

April 4, 2012



Kenneth I. Rose, III, Financial Analyst (3HS62)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Answers to Enclosure E

1. We did not send drums to the Metro Container Site. We purchased finished products from Sunoco's Marcus Hook Facility and other suppliers. Generally we received shipments in bulk, repackaged the products in drums purchased from Metro and sold the drummed product to customers. After customers used the product, we collected the empty drums and transported them back to our facility, where we placed them in a trailer owned by Metro. Metro removed the empty drums from our facility.

Our relationship with Metro was described in the attached April 18, 1988 cover letter to EPA in response to a prior information request. Metro delivered drums in its trailer. The Trailer remained on our site to be filled with empty drums, which Metro collected in a subsequent trip. It bears noting that Metro determined where drum reconditioning was to occur. We have no proof than any or all drums placed on Metro's trailer went to the Metro Container Site.

- 1.a. 116 River Street, Bethlehem, PA 18016 and 4255 Fritch Dr., Bethlehem, PA 18020
- b. We did not produce anything.

2. See above responses.

3. We did not use any raw materials because we only purchased finished products.

4. None

- 5.a. None
- b. Not applicable
- c. Not applicable

- 6. Sunfleet Motor Oils – all grades
Sunfleet Transmission Fluids – all grades
Sunfleet Gear Oils – all grades
Sunvis Hydraulic Oils – all grades
Sunoco Mineral Spirits
Texaco Permanent Anti-freeze
Houghton Permanent Anti-freeze

Fuel ★ Heating ★ Air Conditioning

116 River Street, P.O. Box 1037, Bethlehem, PA 18016-1037 • 610-691-1212 • Fax 610-974-8290
Home Improvement Contractor Registration Number: PA008963

Serving the Lehigh Valley for more than 85 years.

7. Drums returned to Metro's Trailer – 16,503. We sent nothing to the Metro Container Site.
8. We picked up empty drums from customers and placed them on Metro Container's Trailer located at our facility. Metro Container removed its Trailer periodically.
9. See responses to questions number 1 and 6.
10. All drums were empty when picked up from our customers. Original chemical constituents were as described in response to question number 6.
11. To the best of our knowledge we had no contract, only a series of verbal price agreements under which we paid Metro for drum purchases and received a credit for empty drums returned.
12. Anthony J. Mauser, President
Fritch Fuel, Heating, Air Conditioning
116 River Street
P.O. Box 1037
Bethlehem, PA 18016-1037
13. To the best of our knowledge, we have retained all documents relating to our transactions with Metro. We believe these documents are the same as those provided in the April 18, 1988 response noted above
14. We do not know of any.



April 18, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

Ref: Metro Container Corp: EPA letter of April 12, 1988

Dear Mr. Falkin,

The following information and attachments are submitted per your request.

Our relationship with Metro Container was purely as a supplier and reconditioner of 55 gallon metal drums. All drums delivered to us and returned by us was accomplished via Metro Container's van. All drums returned for reconditioning to Metro were completely empty, except for any residue that may have clung to the sides and bottom of drums.

Here is our answers to your specific questions:

1. Fritch never transported any drums or any quantities of hazardous materials to Metro. Products contained in drums and returned for reconditioning are:
 - a. Sunfleet Motor Oils - all grades
 - b. Sunfleet Transmission Fluids - all grades
 - c. Sunfleet Gear Oils - all grades
 - d. Sunvis Hydraulic Oils - all grades
 - e. Sunoco Mineral Sprits
 - f. Texaco Permanent Anti-Freeze
 - g. Houghton Permanent Anti-Freeze
2. Same as No 1. All returned drums were empty, except for residue which clung to the sides and bottoms. All drums were returned by Metro Container van.
3. See attached invoices and loading documents.
4. None.
5. See attached letters.

Mr. Lawrence Falkin

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April 18, 1988

6. No knowledge. All drums returned to Metro via their van.
7. None.
8. All empty drums returned via Metro van were for reconditioning.

The only documentation kept by us for all drums purchased and/or returned was done via Metro invoice and loading slips which are attached.

A copy of a Certificate of Insurance from our agent is attached.

We request that all information given to you is subject to claim of business confidentiality as public law permits.

If you have any questions concerning this matter, please contact me at (215) 691-1212.

Very truly yours,

Lowell B. Brogan
Vice President

dmf

